

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**TOMAS LORENZO PEREZ,  
Defendant.**

**Criminal No. 97-190 (SEC)**

**UNITED STATES' MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT'S DEMAND FOR PRODUCTION OF STATEMENTS, RECORDS  
AND MOTION FOR DISCLOSURE OF GRAND JURY MATERIAL**

TO THE HONORABLE COURT:

COMES NOW the United States of America, through the undersigned attorneys, and very respectfully states and prays as follows:

1. On June 29, 2007, the defendant, Tomás Lorenzo Pérez, filed a Demand for Production of Statements, Records and Motion for Disclosure of Grand Jury Material.
2. Due to the fact that the above-captioned case is closed in our office, we must obtain the original files from the National Archives Federal Record Center. Therefore, the government requests an extension of time of twenty (20) working days to respond to the Motion for Disclosure of Grand Jury Material, said term to be due on August 14, 2007.

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WHEREFORE, the United States respectfully requests an extension of time of twenty (20) working days to respond to the defendant's Motion for Disclosure of Grand Jury Material.

**RESPECTFULLY SUBMITTED.**

In San Juan, Puerto Rico, on this 17<sup>th</sup> day of July, 2007.

ROSA EMILIA RODRIGUEZ-VÉLEZ  
United States Attorney

s/ *Myriam Y. Fernandez-Gonzalez*  
Myriam Y. Fernández-González  
Assistant U.S. Attorney - U.S.D.C. #218011  
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San Juan, P.R. 00918  
Tel. 766-5656

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 17<sup>th</sup> day of July, 2007, I electronically filed the foregoing with the Clerk of the Court using the regular mail notification of such filing to Tomás Lorenzo Pérez, Reg. No. 16054-069, USP COLEMAN I, U.S. PENITENTIARY, P.O. BOX 1033, COLEMAN, FL 33521.

s/ *Myriam Y. Fernandez-Gonzalez*  
Myriam Y. Fernández-González  
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